

Dry Cleaning Compliance Assistance Visit

Owner/Operator:
Facility Name:
Plant Address:
City:
Telephone:

Mailing Address (if different than Plant Address):
Street Address:
City/State:
Phone Number:

Date of Visit:

1. Facility Is Not Subject To The Dry Cleaning NESHA If:

- ☐ Dry Cleaner Is A Pick-Up Store Only
☐ Has only coin-operated dry cleaning machines that are operated by the customers

2. Use Table Below To Determine Size Of Facility (Based On Total Volume Of Perc Purchased Over The Last 12 Months Based On Actual Purchase Receipts. Facility Is Required To Have These Records On Hand)

APPLICABILITY	SMALL AREA SOURCE	LARGE AREA SOURCE	MAJOR SOURCE
FACILITIES WITH:	AMOUNT PERC PURCHASED OVER PRECEDING 12 MONTH PERIOD WAS <u>LESS THAN</u>	AMOUNT PERC PURCHASED OVER PRECEDING 12 MONTH PERIOD WAS <u>EQUAL OR BETWEEN:</u>	AMOUNT PERC PURCHASED OVER PRECEDING 12 MONTH PERIOD WAS <u>MORE THAN:</u>
Only Dry-to-Dry Machines	140 gallons	140-2,100 gallons	2,100 gallons (8,000 liters) PCE/year

Total volume of perchloroethylene (perc) purchased for ALL of the machines at this facility over the past 12 months: _____ gallons

Number of employees at this facility: _____

- ☐ SMALL AREA SOURCE
☐ LARGE AREA SOURCE
☐ MAJOR SOURCE

3. Facility Information (This may be taken from the notifications if no changes have occurred)

Machine Type (dry to dry or transfer)	Date Machine Installed (New Source constructed on or after 12/9/91)	Required Control	Date Control Installed

DNR Staff: _____ Date: _____

Division Approval by: _____ Date: _____

**Perc Dry Cleaner Requirements for
EXISTING LARGE AREA SOURCES**

NOTIFICATION REQUIREMENTS

- ☐ Initial Notification Report Sent To EPA Or DNR (Compliance Date: June 18, 1994)
☐ Pollution Prevention Compliance Report To EPA Or DNR (Compliance Date: June 18, 1994)
☐ Control Equipment Compliance Report to DNR (Compliance Date: October 22, 1996)
☐ Facility Compliance Status Report to DNR (Compliance Date: July 28, 2008)

Subpart M §63.324: Reporting and recordkeeping requirements

(a) Each owner or operator of a dry cleaning facility shall notify the Administrator or delegated State authority in writing within 270 calendar days after September 23, 1993 (i.e., June 18, 1994) and provide the following information: (1) The name and address of the owner or operator; (2) The address (that is, physical location) of the dry cleaning facility; (3) A brief description of the type of each dry cleaning machine at the dry cleaning facility; (4) Documentation as described in §63.323(d) of the yearly perchloroethylene consumption at the dry cleaning facility for the previous year to demonstrate applicability according to §63.320; or an estimation of perchloroethylene consumption for the previous year to estimate applicability with §63.320; (5) A description of the type of control device(s) that will be used to achieve compliance with §63.322 (a) or (b) and whether the control device(s) is currently in use or will be purchased; and (6) Documentation to demonstrate to the Administrator's satisfaction that each room enclosure used to meet the requirements of §63.322(a)(3) meets the requirements of §63.322(a)(3) (i) and (ii).

(b) Each owner or operator of a dry cleaning facility shall submit to the Administrator or delegated State authority by registered mail on or before the 30th day following the compliance dates specified in §63.320 (b) or (c) or June 18, 1994, whichever is later, a notification of compliance status providing the following information and signed by a responsible official who shall certify its accuracy: (1) The yearly perchloroethylene solvent consumption limit based upon the yearly solvent consumption calculated according to §63.323(d); (2) Whether or not they are in compliance with each applicable requirement of §63.322; and (3) All information contained in the statement is accurate and true.

(f) Each owner or operator of a dry cleaning facility shall submit to the Administrator or delegated State authority by registered mail on or before July 28, 2008 a notification of compliance status providing the following information and signed by a responsible official who shall certify its accuracy: (1) The name and address of the owner or operator; (2) The address (that is, physical location) of the dry cleaning facility; (3) If they are located in a building with a residence(s), even if the residence is vacant at the time of this notification; (4) If they are located in a building with no other tenants, leased space, or owner occupants; (5) Whether they are a major or area source; (6) The yearly PCE solvent consumption based upon the yearly solvent consumption calculated according to §63.323(d); (7) Whether or not they are in compliance with each applicable requirement of §63.322; and (8) All information contained in the statement is accurate and true.

Comments: _____

CONTROL EQUIPMENT REQUIREMENTS

In	Out of	Not
Compliance	Compliance	Applicable
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Requirement:

Dry cleaning system must be equipped with a refrigerated condenser OR have a carbon adsorber that was installed prior to September 22, 1993.

Subpart M §63.322: Standards.

(a) The owner or operator of each existing dry cleaning system shall comply with either paragraph (a)(1) or (a)(2) of this section and shall comply with paragraph (a)(3) of this section if applicable.

(a)(1) Route the air-perchloroethylene gas-vapor stream contained within each dry cleaning machine through a refrigerated condenser or an equivalent control device.

(a)(2) Route the air-perchloroethylene gas-vapor stream contained within each dry cleaning machine through a carbon adsorber installed on the dry cleaning machine prior to September 22, 1993.

Comments: _____

POLLUTION PREVENTION REQUIREMENTS

In Compliance	Out of Compliance	Not Applicable	Requirement:
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Keep machine doors closed at all times except when transferring clothes.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operate and maintain system according to manufacturer's specifications and recommendations.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operate the refrigerated condenser so that the air/Perc mixture contained inside the dry cleaning machine is not vented to the atmosphere while the drum is rotating.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Prevent air drawn into the dry cleaning machine when the door of the machine is open from passing through the refrigerated condenser.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The carbon adsorber, if present and used to comply with 63.322(a), is not being by-passed.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drain cartridge filters in their housing or other sealed container for 24 hours before removing from facility.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Store all perc solvent and waste in sealed containers.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Maintain on-site a copy of the design specifications and operating manuals for each machine and control device at facility.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	After July 28, 2008 transfer machine systems using perc are no longer allowed to be operated.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	After December 21, 2020, dry cleaning machines using perc are no longer allowed to be operated in a building with a residence.

<p>(c) The owner or operator shall close the door of each dry cleaning machine immediately after transferring articles to or from the machine, and shall keep the door closed at all other times.</p> <p>(d) The owner or operator of each dry cleaning system shall operate and maintain the system according to the manufacturers' specifications and recommendations.</p> <p>(e) Each refrigerated condenser used for the purposes of complying with paragraph (a) or (b) of this section and installed on a dry-to-dry machine, dryer, or reclaimer:</p> <p>(e)(1) Shall be operated to not vent or release the air-perchloroethylene gas-vapor stream contained within the dry cleaning machine to the atmosphere while the dry cleaning machine drum is rotating;</p> <p>(e)(2) Shall be monitored according to §63.323(a)(1); and</p> <p>(e)(3) Shall prevent air drawn into the dry cleaning machine when the door of the machine is open from passing through the refrigerated condenser.</p> <p>(g) Each carbon adsorber used for the purposes of complying with paragraphs (a) or (b) of this section:</p> <p>(g)(1) Shall not be bypassed to vent or release any air-perchloroethylene gas-vapor stream to the atmosphere at any time; and</p> <p>(g)(2) Shall be monitored according to the applicable requirements in §63.323(b) or (c).</p> <p>(i) The owner or operator of an affected facility shall drain all cartridge filters in their housing, or other sealed container, for a minimum of 24 hours, or shall treat such filters in an equivalent manner, before removal from the dry cleaning facility.</p> <p>(j) The owner or operator of an affected facility shall store all perchloroethylene and wastes that contain perchloroethylene in solvent tanks or solvent containers with no perceptible leaks. The exception to this requirement is that containers for separator water may be uncovered, as necessary, for proper operation of the machine and still.</p> <p>(o)(3) The owner or operator of any dry cleaning system shall eliminate any emission of PCE during the transfer of articles between the washer and the dryer(s) or reclaimer(s).</p> <p>(o)(5)(i) After December 21, 2020, the owner or operator shall eliminate any emission of PCE from any dry cleaning system that is located in a building with a residence.</p> <p>Subpart M §63.324: Reporting and recordkeeping requirements</p> <p>(e) Each owner or operator of a dry cleaning facility shall retain onsite a copy of the design specifications and the operating manuals for each dry cleaning system and each emission control device located at the dry cleaning facility.</p>
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Comments: _____

CONTROL EQUIPMENT MONITORING AND RECORDING REQUIREMENTS

In Compliance
☐

Out of Compliance
☐

Not Applicable
☐

Requirement:

On a weekly basis monitor the refrigerated condenser high and low pressure OR measure the refrigerated condenser outlet temperature before the end of the cool down or drying cycle. Record the results.

The high and low pressure should be in the range specified in the manufacturer's operating instructions. The outlet temperature should be equal to or less than 45°F.

If the air-perchloroethylene gas-vapor stream is passed through a carbon adsorber to comply with §63.322(a)(2), the owner or operator of an affected facility shall measure the concentration of perchloroethylene in the exhaust of the carbon adsorber weekly (and prior to desorption) with a colorimetric detector tube or PCE gas analyzer to determine that the perchloroethylene concentration is equal to or less than 100 parts per million by volume. Results are to be recorded.

Subpart M §63.323 Test methods and monitoring.

(a) When a refrigerated condenser is used to comply with §63.322(a)(1) or (b)(1):

(a)(1) The owner or operator shall monitor on a weekly basis the parameters in either paragraph (a)(1)(i) or (ii) of this section.

(i) The refrigeration system high pressure and low pressure during the drying phase to determine if they are in the range specified in the manufacturer's operating instructions.

(ii) The temperature of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser on a dry-to-dry machine, dryer, or reclaiming machine with a temperature sensor to determine if it is equal to or less than 7.2 °C (45 °F) before the end of the cool-down or drying cycle while the gas-vapor stream is flowing through the condenser. The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure a temperature of 7.2 °C (45 °F) to an accuracy of ±1.1 °C (±2 °F).

(b) When a carbon adsorber is used to comply with §63.322(a)(2) [carbon adsorber was in place prior to 9/22/93] the owner or operator shall measure the concentration of PCE in the exhaust of the carbon adsorber weekly with a colorimetric detector tube or PCE gas analyzer. The measurement shall be taken while the dry cleaning machine is venting to that carbon adsorber at the end of the last dry cleaning cycle prior to desorption of that carbon adsorber or removal of the activated carbon to determine that the PCE concentration in the exhaust is equal to or less than 100 parts per million by volume. The owner or operator shall:

(b)(1) Use a colorimetric detector tube or PCE gas analyzer designed to measure a concentration of 100 parts per million by volume of PCE in air to an accuracy of ±25 parts per million by volume; and

(b)(2) Use the colorimetric detector tube or PCE gas analyzer according to the manufacturer's instructions; and

(b)(3) Provide a sampling port for monitoring within the exhaust outlet of the carbon adsorber that is easily accessible and located at least 8 stack or duct diameters downstream from any flow disturbance such as a bend, expansion, contraction, or outlet; downstream from no other inlet; and 2 stack or duct diameters upstream from any flow disturbance such as a bend, expansion, contraction, inlet, or outlet.

Subpart M §63.324: Reporting and recordkeeping requirements.

Maintain a log of the following information and keep it on file for a period of five years:

(d)(5) The date and monitoring results (temperature sensor or pressure gauge), as specified in §63.323 if a refrigerated condenser is used to comply with §63.322(a), (b) or (c); and

(d)(6) The date and colorimetric detector tube monitoring results, as specified in §63.323, if a carbon adsorber is used to comply with §63.322(a)(2), or (b)(3).

Comments: _____

INSPECTION AND MAINTENANCE REQUIREMENTS

In Compliance	Out of Compliance	Not Applicable	Requirement:
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Conduct a weekly inspection of the dry cleaning system for perceptible leaks while the dry cleaning system is in operation. Document the results of the inspection.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	After July 28, 2008 a halogenated hydrocarbon detector or PCE gas analyzer shall be used to check for vapor leaks once a month. This monitoring can replace one of the weekly inspections.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Repair any perceptible leaks discovered during the weekly inspection within 24 hours. If parts are needed, they are to be ordered within 2 days and installed within 5 days of receipt. Document any repair work.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If the dry cleaning system pressure, temperature or perc concentration are out of compliance with the applicable standard, adjustments or repairs must be made. If parts are needed, they are to be ordered within 2 days and installed within 5 days of receipt. Document any repair work.

Subpart M §63.322: Standards.

(k) The owner or operator of a dry cleaning system shall inspect the following components weekly for perceptible leaks while the dry cleaning system is operating:

- (k)(1) Hose and pipe connections, fittings, couplings, and valves;
- (k)(2) Door gaskets and seatings;
- (k)(3) Filter gaskets and seatings;
- (k)(4) Pumps;
- (k)(5) Solvent tanks and containers;
- (k)(6) Water separators;
- (k)(7) Muck cookers;
- (k)(8) Stills;
- (k)(9) Exhaust dampers;
- (k)(10) Diverter valves; and
- (k)(11) Cartridge filter housings.

(m) The owner or operator of a dry cleaning system shall repair all perceptible leaks detected under paragraph (k) or (o)(1) of this section within 24 hours. If repair parts must be ordered, either a written or verbal order for those parts shall be initiated within 2 working days of detecting such a leak. Such repair parts shall be installed within 5 working days after receipt.

(n) If parameter values monitored under paragraphs (e), (f), or (g) of this section do not meet the values specified in §63.323(a), (b), or (c), adjustments or repairs shall be made to the dry cleaning system or control device to meet those values. If repair parts must be ordered, either a written or verbal order for such parts shall be initiated within 2 working days of detecting such a parameter value. Such repair parts shall be installed within 5 working days after receipt.

(o)(1) After July 28, 2008 the owner or operator of a dry cleaning system shall inspect the components listed in paragraph (k) of this section for vapor leaks monthly while the component is in operation.

(i) Area sources shall conduct the inspections using a halogenated hydrocarbon detector or PCE gas analyzer that is operated according to the manufacturer's instructions. The operator shall place the probe inlet at the surface of each component interface where leakage could occur and move it slowly along the interface periphery.

(iii) Any inspection conducted according to this paragraph shall satisfy the requirements to conduct an inspection for perceptible leaks under §63.322(k) or (l) of this subpart.

Subpart M §63.324: Reporting and recordkeeping requirements.

Maintain a log of the following information and keep it on file for a period of five years:

- (d)(3) The dates when the dry cleaning system components are inspected for perceptible leaks, as specified in §63.322(k) or (l), and the name or location of dry cleaning system components where perceptible leaks are detected;
- (d)(4) The dates of repair and records of written or verbal orders for repair parts to demonstrate compliance with §63.322(m) and (n)

Comments: _____

RECORD KEEPING AND REPORTING REQUIREMENTS

In Compliance	Out of Compliance	Not Applicable	Requirement:
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Each month calculate the sum of the volume of perc purchased during the previous 12 month period. Maintain purchase receipts, a log showing the monthly purchase volumes and a record of the monthly calculations.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Submit a notice of compliance status to the DNR if the facility exceeds the perc consumption limits for a large area source and becomes a major source.

Subpart M §63.323: Test methods and monitoring.

(d) When calculating yearly perchloroethylene consumption for the purpose of demonstrating applicability according to §63.320, the owner or operator shall perform the following calculation on the first day of every month:

(d)(1) Sum the volume of all perchloroethylene purchases made in each of the previous 12 months, as recorded in the log described in §63.324(d)(1).

(d)(2) If no perchloroethylene purchases were made in a given month, then the perchloroethylene consumption for that month is zero gallons.

(d)(3) The total sum calculated in paragraph (d) of this section is the yearly perchloroethylene consumption at the facility.

Subpart M §63.324: Reporting and recordkeeping requirements.

(c) Each owner or operator of an area source dry cleaning facility that exceeds the solvent consumption limit reported in paragraph (b) of this section shall submit to the Administrator or a delegated State authority by registered mail on or before the dates specified in §63.320 (f) or (i), a notification of compliance status providing the following information and signed by a responsible official who shall certify its accuracy:

(1) The new yearly perchloroethylene solvent consumption limit based upon the yearly solvent consumption calculated according to §63.323(d);

(2) Whether or not they are in compliance with each applicable requirement of §63.322; and

(3) All information contained in the statement is accurate and true.

(d) Each owner or operator of a dry cleaning facility shall keep receipts of perchloroethylene purchases and a log of the following information and maintain such information on site and show it upon request for a period of 5 years:

(d)(1) The volume of perchloroethylene purchased each month by the dry cleaning facility as recorded from perchloroethylene purchases; if no perchloroethylene is purchased during a given month then the owner or operator would enter zero gallons into the log;

(d)(2) The calculation and result of the yearly perchloroethylene consumption determined on the first day of each month as specified in §63.323(d);

Comments: _____